Desk Instruction 3.1
"Integrated Safety Management System (ISMS) Declaration Process"

March 24, 2005

Revision 1

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1.0 Purpose

The U.S. Department of Energy (DOE), Integrated Safety Management System (ISMS) provides a formal, organized process for planning, performing, assessing, and improving the safe conduct of work at Hanford.

This procedure provides guidance to the Office of River Protection (ORP) staff responsible for the preparation of the annual ISMS declaration of readiness. The declaration is due to the Assistant Secretary for Environmental Management (EM) annually by October 31.

This procedure will assist DOE line managers to:

- Provide ISMS guidance.
- Review and approve ISMS products.
- Verify effective implementation and execution of the ISMS.

2.0 Policy

ORP will review and approve ISM systems in accordance with DEAR 48 CFR 970.5223-1(e) and the Functions, Responsibilities and Authorities Manual (FRAM). DEAR 48 CFR 970.5223 requires the DOE and its contractors to continually maintain the integrity of the ISMS. DEAR also states the contractor will review and update annually its safety performance objectives, performance measures, and corrective action commitments with DOE program guidance.

The Assistant Secretary for EM requires field offices to provide assurance ISMS systems are being maintained and functioning in an effective manner. Assurance is documented by submittal of the annual declaration of readiness. This declaration states the project's status in implementing ISMS, and the effectiveness of the program.

3.0 Expectations

The ORP and its contractors will systematically integrate safety into management and work practices at all levels. To achieve this objective, DOE has established guiding principles and core safety management functions. An effective ISMS must address these principles and functions. Table 1 presents the DOE ISMS core functions and guiding principles.

Table 1 – ISMS Core Functions and Principles.

Core Functions (48 CFR 970.5223-1c)	Guiding Principles (48 CFR 970.5223-1b)
1. Define Scope of Work	1. Line Management Responsibility
2. Analyze Hazards	2. Clear Roles and Responsibilities
3. Develop and Implement Controls	3. Competence per Responsibilities
4. Perform Work	4. Balanced Priorities
5. Feedback and Improvement	5. Identification of Safety Standards
	6. Tailored Hazard Controls to Work
	7. Operations Authorization

Figure 1 shows the integration and interrelationships of the core functions. These functions are

not independent or sequential, but rather a linked collection of functions that occur simultaneously.

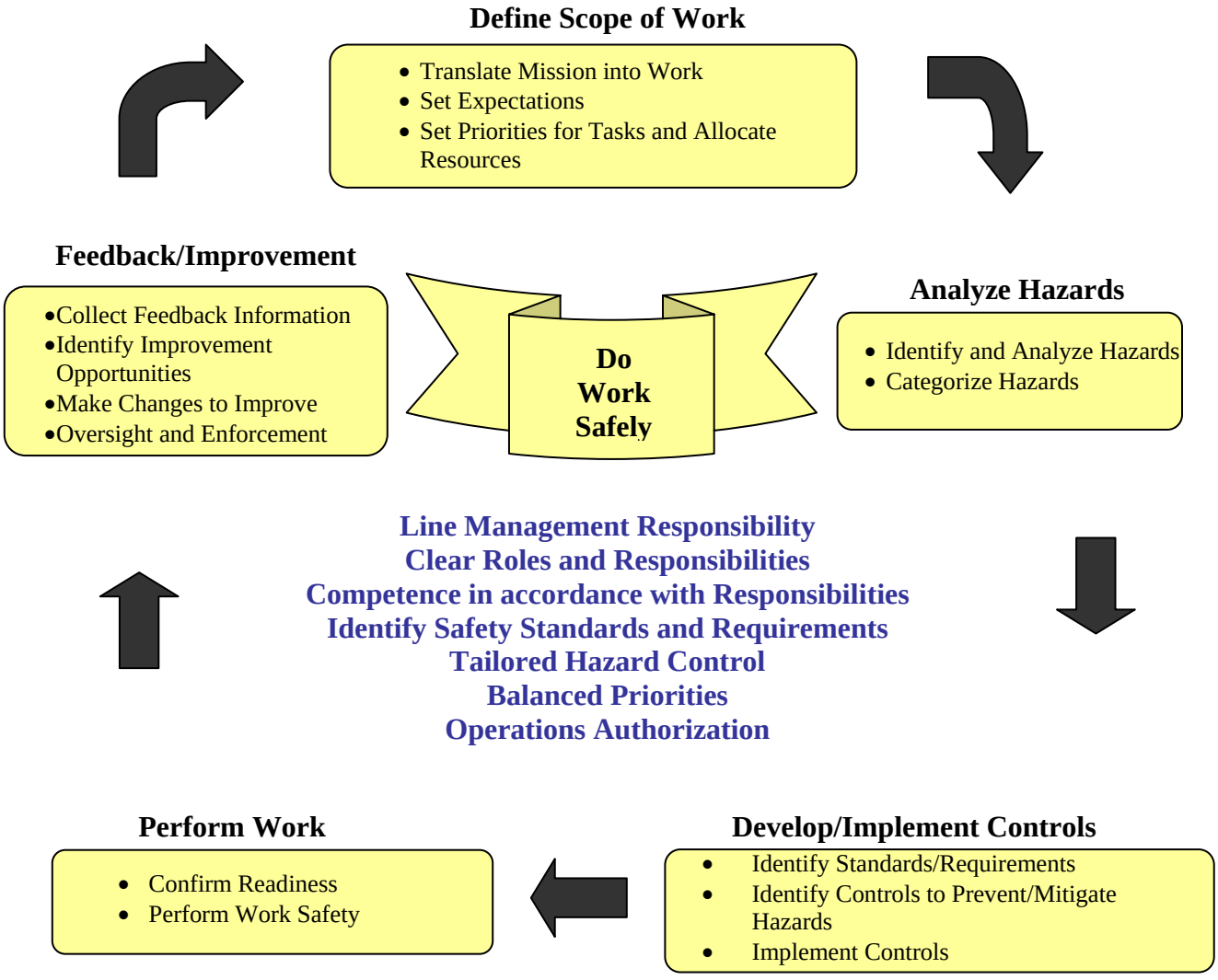

Figure 1 – ISMS Core Functions and Guiding Principles.

4.0 Application

This desk instruction and policy applies to DOE employees and DOE contractors responsible for implementing and maintaining the ORP ISMS.

5.0 General Requirements

Safety is incorporated as a value into all ORP business, operations and construction systems. From a systems and work integration standpoint, ISMS provides criteria and core expectations for prioritizing work activities and resolving conflicting objectives. Most importantly, ISMS ensures work is adequately planned to mitigate potential hazards. The following ISMS requirements are expected to drive behavior and performance for all ORP work activities:

Table 2 – ORP ISMS General Requirements

The contractor ISM systems will be clearly documented in Description documents. Revisions to the Description document are submitted to ORP for approval each fiscal year. The Description document identifies how the contractor will perform the five core functions and seven guiding principles of ISMS.
The DOE line organizations have the responsibility to ensure the contractors develop and effectively implement an ISMS tailored to the risk of work and the associated hazards.
Workplace hazards and potential hazards are identified and mitigated before work begins.
ORP will perform annual assessments and declaration of ISMS readiness.
Contractors will submit its ISMS documentation and declaration to ORP annually.
ISMS performance metrics are developed by the contractor. Revisions to these metrics are submitted annually to ORP for approval.
Contractors continuously track and measure performance against the ISMS metrics and objectives.
Formal corrective action plans (CAP) for areas of ISMS weakness or deficiency will be developed, documented and tracked through completion.

6.0 Responsibilities

The implementation and maintenance of an ISMS requires an organization to integrate safety into all aspects of work planning and execution. The ORP FRAM establishes the responsibilities for managing the functions fundamental to safety management.

The Environmental, Safety and Quality (ESQ) organization is responsible for establishing and coordinating the overall ISMS policies and objectives for ORP. The ORP line organizations, Tank Farms Project and Waste Treatment and Immobilization Project (WTP), are responsible for ensuring ISMS is effectively administered by the ORP contractors. Table 3 identifies ORP organizational responsibility for each key ISMS action.

Table 3 – ISMS Points of Contact (POCs).

ISMS Actions	ORP Organization
Develop and maintain the Integrated Safety Management System description in the ORP FRAM	ESQ ISMS Coordinator
Provide ISMS implementation guidance	ESQ Director and ISMS Coordinator
Ensure effective implementation of ISMS at the Tank Farms (TF)	Assistant Manager for the Tank Farms Project and TF Facility Representatives (FRs)

ISMS Actions	ORP Organization
Ensure effective implementation of ISMS	WTP Manager and WTP FRs

at the WTP	
Declare the Tank Farms Contractor (TFC) has a viable ISMS	Assistant Manager for the Tank Farms Project and FRs
Declare the WTP Contractor has a viable ISMS	WTP Manager and FRs
Declare ORP has a viable ISMS (includes both ORP and contractors)	ESQ Director and ORP Manager

7.0 ISMS Declaration Process

The following action plan (Table 4) is established to maintain a continuous ISMS assessment and improvement process. The following course of action ensures ORP performs an effective ISMS readiness review and declaration each year. The ORP declaration is to be completed, approved and submitted to EM-3.2 by October 31 of each year. The ESQ ISMS Coordinator oversees the process for ORP.

Table 4 – ISMS Readiness Declaration Action Plan.

Process Step	Action Description	Schedule	Action Responsibility
1.	Perform assessments of contractor safety management systems and components.	Ongoing throughout each fiscal year.	TFP and WTP Facility Representatives.
2.	Perform programmatic assessments of contractor systems.	Ongoing throughout each fiscal year.	ESQ Assessors and ISMS Coordinator.
3.	ORP sends letter to Contractors (TFC and WTPC) requesting review and update of the ISMS Description documents.	By February 25th.	ISMS Coordinator.
4.	Contractors submit ISMS Description revisions to ORP (as applicable).	By April 30th.	TFC and WTPC.
5.	ORP receives EM-3.2 ISMS Guidance, as issued. Note: EM-3.2 may not issue ISMS guidance each fiscal year.	By August 15th.	EM-3.2
6.	ORP completes their annual ISMS assessment and/or review of contractor ISMS programs.	By August 30th.	Line Organization FRs and ISMS Coordinator
7.	ORP issues ISMS declaration readiness guidance to Contractors.	By September 1st.	ISMS Coordinator.
8.	Contractors complete their annual ISMS self-assessment and submit ISMS readiness declarations to ORP.	By October 1st.	TFC and WTPC
9.	ORP line organizations submit ISMS readiness declarations to the Coordinator.	By October 15th.	Line Organization FRs.
10.	ORP Manager receives annual ORP ISMS	By October 27th.	ISMS Coordinator

	readiness declaration for approval.		and ESQ Director.
11.	ORP Manager submits declaration to EM-3.2	By October 29th.	ORP Manager.
12.	All ISMS corrective actions input into CARS for tracking.	By Nov. 3rd.	ISMS Coordinator.
13.	Verify ISMS corrective action (CA) completion.	Within 30 days after CA completion.	ISMS Coordinator and FRs.

8.0 ISMS Declaration Content and Format

Attachment 1 provides the template for the annual ORP ISMS readiness declaration report. This template is to be followed and utilized by ORP. ORP line management should also provide this information to the contractors as guidance for preparation of their ISMS readiness declarations.

9.0 References

DOE Policy 450.4, *Safety Management System Policy.*

DOE Guide 450.4-1A, *Integrated Safety Management System Guide*, Chapter IV, provides guidance for DOE and its contractors for keeping an approved ISMS effective through continuous improvement actions and assessment.

ORP M 450.4, Revision 1, *Integrated Safety Management System Description.*

Memorandum, August 19, 2004, From Mr. Paul Golan, *Submittal of Annual Integrated Safety Management System Declarations Memorandum for Distribution to Field Managers.*

Attachment 1

Integrated Safety Management System (ISMS)
Readiness Declaration Table of Contents

1.0 ISMS Declaration of Readiness

Provide a statement of assurance that ISM systems are being maintained and are functioning in an effective manner. Provide a summary of activities that have been performed to verify this, overview of program performance, and corrective actions and program changes planned.

If the ISMS is not declared ready, provide a status of the system, the deficiencies and the actions to be taken to obtain compliance. ORP will identify their associated actions for re-qualifying the ISMS program. This action may range from the justification of corrective action completions to a complete re-qualification and performance of the ISMS Phase I and Phase II assessments.

2.0 ISMS Background and Overview

Provide an overview of the ISM system installed, its maturity and the safety culture that has been created.

3.0 ISMS Objectives

Identify the organization's ISMS goals, objectives and commitments for the next year. Objectives and goals should emphasize worker Safety and Health. The objectives are provided by the contractor to ORP and agreed upon by the respective ORP line manager.

4.0 Planned Program Improvements

Provide a list of bullets detailing all planned/scheduled ISMS changes (including revisions to the ISMS Descriptions), planned ISMS re-verification efforts, ISMS program and program element reviews/assessments, planned corrective actions and completion dates of ISMS related identified deficiencies, and planned verifications of corrective action effectiveness.

5.0 Evaluations of Performance

Provide a detailed assessment of ISMS performance by citing and evaluating objective evidence of system performance and continuous improvement. Possible objective evidence includes results from performance metrics and trending, assessments and self assessments, ISM re-verifications, independent assessments, and analysis of abnormal events.

The ISMS assessment should identify the specific evaluations and measurement tools used by the organization to determine ISMS effectiveness throughout the past fiscal

year. Explain these evaluations by core ISMS function and guiding principle that were evaluated:

Guiding principles:

- Line management responsibility for safety. Include training and qualification program effectiveness;
- Clear roles and responsibilities;
- Competence commensurate with responsibilities;
- Balanced priorities;
- Identification of environmental, safety and health (ES&H) standards and requirements;
- Hazard controls tailored to work;
- Operations authorization; and
- Worker involvement.

Core Functions:

- Define the scope of work;
- Analyze the hazards. Include effectiveness of hazard assessment and industrial hygiene monitoring;
- Develop and implement hazard controls;
- Perform work within controls. Discuss viability of work procedure reviews; and
- Feedback and continuous improvement. Include Employee Concerns Program effectiveness; the usefulness of DOE assessments; whether sufficient feedback is being provided to the contractor; and evidence of a Corrective Action Management process.

As an enhancement to the topics addressed above, possible topics and lines of inquiry to include in the assessment are provided in G 450.4-1A continuing core expectations (CCEs) as follows:

- CCE – 1. ISMS updates in response to budget execution process are completed.
  - DOE provides annual program and budget execution guidance.
  - The contractor updates the safety and performance objectives.

  - The ISMS description is updated and submitted to ORP for approval.

- CCE – 2. System effectiveness is measured against the Description document and found to be satisfactory.

  - Safety performance objectives, performance measures, and commitments are met or exceeded.
  - Performance measures are revised as appropriate for the next year.

- CCE – 3. Work activities reflect effective implementation of the ISMS.

  - Work is defined.
  - Hazards are identified.
  - Actions taken to prevent or eliminate hazards.
  - Work controls are developed and implemented.
  - Work is properly authorized and accomplished within controls.
  - Workers are involved in work planning.

- CCE – 4. Implementing mechanisms continue to support the principles of ISMS.

  - Promulgated roles and responsibilities are clear.
  - Line management is responsible for safety.
  - Required competence is commensurate with responsibilities.
  - Staff continues to improve safety system knowledge.

- CCE – 5. Budget processes ensure work priorities are balanced with safety.

  - Budget development and change control ensure safety is balanced with production goals.
  - Facility procedures ensure safety is balanced with production goals.

- CCE – 6. An effective feedback and improvement process exists and is functioning at each level of the organization.

  - The expectations of DOE P 450.5 are in place.
  - Issues are effectively identified, tracked and addressed.
  - Issues resolution is effective.

- CCE – 7. DEAR List A and List B (safety standards and requirements) is reviewed and updated annually with the budget cycle.

  - Authorization Agreements and Authorization Basis documents are current.
  - Changes in agreed upon standards and requirements are included to reflect mission changes.

- CCE – 8. Performance objectives and criteria guidance for assessments focus reviews on the adequate implementation of the core functions and principles of ISMS.

- CCE – 9. Relevant records reflect an improving ISMS.

    - Records include routine DOE and contractor self-assessment and independent reports.
    - Feedback, improvement and change control of the contractor ISMS description is in place and effective.

- CCE – 10. ISMS procedures are in place to ensure work is formally and appropriately authorized and performed safely in a manner which protects the worker, public and environment from harm.

    - DOE line managers are involved in the review of safety issues and concerns.
    - DOE line managers are involved in authorizing and approving work and operations.

- CCE – 11. Procedures and mechanisms are in place to ensure hazards are analyzed and mitigated.

    - DOE line managers are using ISMS procedures effectively and consistent with the FRAM and FRA.

Lastly, EM-3.2 provides additional criteria to be assessed and included in the ISMS analysis:

- Effectiveness of hazard assessment and industrial hygiene exposure monitoring aspects of work and the implementation of work procedures and hazard controls.

- Employee Concerns Program regarding the reporting of safety related issues and effectiveness of resolving concerns in a timely manner.

- Training and qualification programs and periodicity for re-qualification for both workers and audit/assessment personnel.

- Requirement and frequency for work procedure reviews and updates.

- Discussion on how the U.S. Department of Energy (DOE) oversight and contractor self-assessments are providing sufficient feedback on the implementation and maintenance of the ISM systems.

- Evidence of a Corrective Action/Issues Management process that is providing timely lessons learned and improvement actions.

- Listing of each DOE field office approved “Performance objective, performance measures, and commitments” as required by DOE Acquisition Regulations (DEAR) Clause 48 CFR 970.5223-1(e), and the corresponding results for the fiscal year;.

- An overall judgment as to whether ISM is effectively implemented.